



# Judicial Council of California

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## REPORT TO THE JUDICIAL COUNCIL

*Item No.: 25-126*

For business meeting on December 12, 2025

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**Title**

Judicial Council Administration: Judicial  
Council Conflict of Interest Code

**Report Type**

Action Required

**Effective Date**

January 1, 2026

**Rules, Forms, Standards, or Statutes Affected**

Amend Conflict of Interest Code for the  
Judicial Council of California

**Date of Report**

November 19, 2025

**Recommended by**

Michelle Curran, Administrative Director  
Judicial Council

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### Executive Summary

In accordance with Government Code sections 87303 and 87306, the *Conflict of Interest Code for the Judicial Council of California* must be updated “when change is necessitated by changed circumstances, including the creation of new positions.” (Gov. Code, § 87306.) The council must review the proposed amendment to the code and approve the code as amended or direct that it be further revised and resubmitted for approval. Judicial Council staff propose amendments to the code to expand the list of job classifications requiring economic interest disclosure to encompass the Building Official, Compliance Architect, Data Scientist, and Facilities AV Systems Specialist positions. This proposal would also amend category 7, Decision-Making Authority Affecting Real Property and Management, to include the requirement to disclose interests in real property, which is applicable to all classifications within this category. Additionally, this amendment includes minor copyediting corrections for grammar and clarification that do not change the scope of the code.

### Recommendation

Judicial Council staff recommend that the Judicial Council, effective January 1, 2026, amend *Conflict of Interest Code for the Judicial Council of California* as follows:

1. Add “Building Official” (Appendix B, section 3), reporting requirement category 1b. The Building Official is responsible for providing high-level management oversight of multiple units involved in the most complex, specialized, and sensitive functional areas, allocating resources through the Architecture/Engineering Supervisor and other Facilities Supervisors as assigned.
2. Add “Compliance Architect” (Appendix B, section 3), reporting requirement category 7. The Compliance Architect is responsible for providing review of architectural plans, designs, codes, and standards to ensure technical effectiveness and code compliance for new construction and modification projects. Incumbents work directly with regulatory agencies and exercise independent judgment in implementing policies, procedures, and standards.
3. Add “Data Scientist” (Appendix B, section 3), reporting requirement category 5. The Data Scientist holds the same supervisory decision-making and recommending authority regarding the classification’s functional area. This classification should therefore be included in the code as a classification required to disclose a statement of economic interest.
4. Add “Facilities AV Systems Specialist” (Appendix B, section 3), assigned disclosure category 3. The Facilities AV Systems Specialist is responsible for administering the procurement and solicitation processes for audiovisual systems and providing oversight of the work of contracted staff.
5. Add a reporting requirement to Appendix C, category 7, to include financial interests in real property.
6. Change the revision date to 2026 and make other minor copyediting corrections.

The text of the proposed amended code is included as Attachment A.

### **Relevant Previous Council Action**

At its business meeting on November 19, 2021, the Judicial Council amended the *Conflict of Interest Code for the Judicial Council of California* to include the classification of Construction Inspector, disclosure category 7, to the list of classifications requiring submission of *Statement of Economic Interests* (FPPC form 700).

### **Analysis/Rationale**

The Political Reform Act of 1974 (Gov. Code, § 81000 et seq.) requires public agencies to adopt conflict of interest codes. (Gov. Code, § 87300.) A conflict of interest code is a document that states the rules and procedures by which designated officers and employees of a public agency must disclose certain personal financial interests. The financial interests required to be disclosed are those that foreseeably could be materially affected by decisions that these officers or employees are authorized to make or influence. In 1984, the Legislature amended the Political Reform Act to require agencies and employees of the judicial branch to comply with the act.<sup>1</sup>

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<sup>1</sup> Stats. 1984, ch. 727, amending Gov. Code, §§ 82011, 82019, 82041, 82048, 82049, and 87200 and adding § 87311.5.

Every conflict of interest code, including amended codes, must be submitted to and approved by a “code reviewing body.” (Gov. Code, §§ 87303, 87306.)

The Judicial Council is the code-reviewing body for “any state agency within the judicial branch of government” where no other code-reviewing body has been specified (Gov. Code, § 82011(h)); this includes the Judicial Council and its staff. The Government Code further states that an agency’s conflict of interest code must be amended “when change is necessitated by changed circumstances.” (Gov. Code, § 87306.)

### **Conflict of interest code for members of the Judicial Council**

The current code requires Judicial Council members who are justices, judges, legislators, court executive officers, or court clerks or administrators—whether voting or nonvoting members—to disclose their financial interests and “[a]ll investments, sources of income, interests in real property, and positions in business entities.” Even though they perform unique duties as council members, they are all required to indicate on the cover sheet of form 700 that their statements are being filed for both their primary and Judicial Council positions. All attorneys, whether voting or nonvoting, must file form FPPC-2, which discloses whether they were required to disqualify themselves from making, participating in making, or attempting to influence a decision of the Judicial Council during the reporting period because of a conflict of interest.

### **Conflict of interest code for Judicial Council staff**

The current code for staff contains seven disclosure categories. The broadest, category 1, provides for disclosure of “[a]ll investments, sources of income, interests in real property, and positions in business entities.” Those who fall within this category include certain classification designations with foreseeable decision-making authority that could be affected by personal financial interests. Other employees must disclose a narrower range of financial interests that could be affected by their specific job duties.

### **Policy implications**

There are no policy implications.

### **Comments**

Judicial Council staff posted the proposed amendments to the conflict of interest code on the “Invitations to Comment” page of the California Courts website for 45 days for the purpose of receiving comments from the public as required by the Fair Political Practices Commission. This proposal was circulated for public comment from July 8 through August 22, 2025. One comment was received, which agreed with the proposal. A chart with the text of the comment is included as Attachment B.

### **Alternatives considered**

Per Government Code section 87306, periodic reviews of the *Conflict of Interest Code for the Judicial Council of California* are required to ensure that the code reflects the current structure of the agency and properly identifies all officials and employees who should file *Statement of Economic Interests* (form 700). The current code does not accurately reflect the agency’s current structure. The Political Reform Act of 1974 does not provide for any alternative actions other than those presented in this report.

## **Fiscal and Operational Impacts**

Approving this recommendation will create no financial impact on the Judicial Council. To implement the amended conflict of interest code, the Judicial Council will need to ensure that its employees in the designated classifications timely submit *Statement of Economic Interests* (form 700), required under the conflict of interest code and the Political Reform Act. If approved, the amended conflict of interest code will take effect on January 1, 2026, and will be applied accordingly to filers in 2026.

## **Attachments and Links**

1. Attachment A: *Conflict of Interest Code for the Judicial Council of California*
2. Attachment B: Chart of comments
3. Link A: Conflict of Interest Code for the Judicial Council of California (revised effective Dec. 1, 2021), <https://www4.courts.ca.gov/documents/jc-conflict-of-interest-code.pdf>

**CONFLICT OF INTEREST CODE  
FOR THE  
JUDICIAL COUNCIL OF CALIFORNIA  
(Revised effective January 1, 20242026)**

The Political Reform Act (Gov. Code, § 81000 et seq.) requires state and local government agencies to adopt and promulgate conflict of interest codes. The Fair Political Practices Commission has adopted a regulation, California Code of Regulations, title 2, section 18730, ~~which that~~ contains the terms of a standard conflict of interest code, and can be incorporated by reference into an agency's code. After public notice and hearing, the code may be amended by the Fair Political Practices Commission to conform to amendments in the Political Reform Act. Therefore, the terms of ~~(Cal. California Code Regs., tit. of Regulations, title 2, §section 18730.)~~ and any amendments to it duly adopted by the Fair Political Practices Commission are hereby incorporated by reference. This regulation and the attached ~~appendices shallappendixes will~~ constitute the *Conflict of Interest Code for the Judicial Council of California*.

Designated employees and contractors ~~shall~~are required to file statements of economic interests with the Administrative Director as prescribed by the Fair Political Practices Commission.

## Appendix A

### Judicial Council Members

Under ~~Article~~article VI, section 6, of the California Constitution, Judicial Council voting membership is limited to justices, judges, legislators, and attorneys. Two nonvoting court administrators and such other nonvoting members are determined by the voting membership of the council. Council members, voting or nonvoting, who are justices, judges, state legislators, court executive officers, and court administrators and clerks are required to file disclosure statements at their primary position because they are subject to comprehensive disclosure requirements arising out of their primary offices, ~~pursuant to~~under Government Code sections 87200 and 87300. When filing their annual statement of economic interests, council members, voting or ~~non-voting~~nonvoting, should indicate on the cover sheet of ~~the~~ Conflict Statement of Interest-Economic Interests (Form-form 700) that their statements are being filed for both their primary and their Judicial Council positions.

### Designation of Positions

#### 1. Voting Council Members

##### a. Justices, Judges, and Legislators

- i. **Disclosure of ~~Financial Interests~~financial interests:** Council members must disclose all investments, sources of income, interests in real property, and positions in business entities, including those of their spouses, registered domestic partners, and/or dependent children.
- ii. **Manner of ~~Reporting~~reporting:** When filing their annual statement of economic interests, council members should indicate on the cover sheet of Conflict Statement of Interest-Economic Interests (Form-form 700) that their statements are being filed for both their primary and their Judicial Council positions.

##### b. Attorneys

- i. **Disclosure of ~~Financial Interests~~financial interests:** The disclosure requirements under this code for the designated attorney members are limited to those in Business and Professions Code section 6036, ~~subdivision~~(d). Under this provision, ~~a member~~members required to disqualify ~~himself or herself~~themselves because of a conflict of interest ~~shall~~must (1) immediately disclose the interest, (2) withdraw from any participation in the matter, (3) refrain from attempting to influence another member, and (4) refrain from voting. Consistent with section 6036, ~~subdivision~~(d), it is sufficient that ~~the~~ ~~member~~members indicate only that ~~he or she has~~they have a disqualifying financial or personal interest, without disclosing the specific interest.

- ii. **Manner of ~~Reporting~~reporting:** Attorney members of the Judicial Council of California ~~shall be required to~~ file ~~the~~ *Statement of Economic Interests ~~for Attorney Members of the Judicial Council~~* (form FPPC-2). This form requires members to (1) disclose whether ~~or~~ ~~not~~ they were required to disqualify themselves from making, participating in making, or attempting to influence a decision of the Judicial Council during the reporting period because of a conflict of interest under Business and Professions Code section 6036, and (2) identify each decision requiring disqualification.

## 2. Nonvoting Council Members

- a. **Justices, Judges, Court Executive Officers, Court Administrators, and Clerks, and ~~s~~Such ~~o~~Other ~~n~~Nonvoting ~~m~~Members as ~~d~~Determined by the ~~v~~Voting ~~m~~Membership of the ~~e~~Council**
  - i. **Disclosure of ~~Financial Interests~~financial interests:** Council members must disclose all investments, sources of income, interests in real property, and positions in business entities, including those of their spouses, ~~including~~ registered domestic partners, and/or dependent children.
  - ii. **Manner of ~~Reporting~~reporting:** When filing their annual statement of economic interests, council members should indicate on the cover sheet of ~~Conflict~~*Statement of Interest-Economic Interests (Form-form 700)* that their statements are being filed for both their primary and their Judicial Council positions.

## Appendix B.

### Judicial Council Member and Staff List of Designated Classifications and Assigned Disclosure Categories

<b>1. Judicial Council Members</b>	
a. Voting and Nonvoting Members	1a
b. Voting and Nonvoting Attorney Members	2a
<b>2. Executive Level</b>	
a. Supervisorial and Management-Level Classifications	1b
b. All Attorney and Supervising Attorney Classifications	2b
c. Legislative Advocate	3, 4
d. Principal Advisor	3, 4
<b>3. All <del>Divisions</del>*<u>Judicial Council Offices</u></b>	
a. Supervisorial and Management-Level Classifications	1b
b. All Attorney and Supervising Attorney Classifications	2b
c. Facilities Management Administrator	7
d. Senior Facilities Analyst and Facilities Analyst	7
e. <u>Senior Project Manager and Project Manager</u>	7
f. Engineering Specialist, Engineer, and Construction Inspector	7
<u>g. Compliance Architect</u>	<u>7</u>
<u>h. Building Official</u>	<u>1b</u>
<u>i. Facilities AV Systems Specialist</u>	<u>3</u>
<u>j. All Classifications in Procurement <del>&amp;</del><u>and</u> Contracts</u>	<u>3, 4</u>
<del>h</del> <u>k. All Classifications in Phoenix Purchasing Support Services</u>	<u>3, 4</u>
<del>il.</del> <u>Data Scientist and Information Technology Architect</u>	<u>5</u>
<del>jm.</del> <u>Education Developer and Senior Education Developer</u>	<u>6</u>
<del>kn.</del> <u>Administrative Coordinators in Conference <del>&amp;</del><u>and</u> Registration Services</u>	<u>3, 4</u>
<del>lo.</del> <u>Special Consultant</u>	<u>1b</u>
<del>m.</del> <u>and Contractor*</u>	<u>1b</u>

\*\_Consultants (contractors) ~~shall be~~are included in the list of designated positions and ~~shall~~are required to disclose ~~pursuant to~~under the broadest disclosure category in the code subject to the following limitation:

The Administrative Director may determine in writing that a particular consultant, although a “designated position,” is hired to perform a range of duties that are limited in scope and thus is not required to fully comply with the disclosure requirements described in this section. Such written determination ~~shall~~must include a description of the consultant’s duties and, based ~~upon~~on that description, a statement of the extent of disclosure requirements. The consultant must comply with all other provisions of this code. The Administrative Director’s determination is a matter of public record and ~~shall~~will be retained for public inspection in the same manner and location as this ~~Conflict~~conflict of ~~Interest~~interest ~~Code~~interest code.



| Per [policy 8.3\(B\)](#) of the *Judicial Council Personnel Policies and Procedures Manual*, “[i]f an employee determines that he or she must not be involved in a decision on a particular matter because of a financial interest, then the employee must immediately withdraw from participating in the decision, refrain from influencing others, and disclose the financial interest in writing to his or her supervisor.”

## Appendix C.

### Judicial Council Staff Disclosure Categories

An employee need only disclose a financial interest, or a spouse's financial interest, in a business entity included in an assigned category if the employee's duties involve making recommendations and/or decisions concerning that type of business entity. In this appendix, "positions" includes employee, partner, officer, director, trustee, and any other management position. "Providers" includes business entities and individuals that who are manufacturers, distributors, vendors, sellers, lessors, suppliers, contractors, subcontractors, and other providers of the supplies, equipment, real property, and services indicated in the category.

#### 1. Executive ~~a~~Authority

~~All~~ Designated filers with executive authority are required to disclose all investments, sources of income, interests in real property, and positions in business entities.

- a. Council members who are justices, judges, legislators, court executive officers, and/or court administrators and/or clerks are required to file disclosure statements at their primary position because they are subject to comprehensive disclosure requirements arising out of their primary offices; ~~pursuant to~~ under Government Code ~~section~~ sections 87200 and 87300. When filing their annual statement of economic interests, council members, voting or nonvoting, should indicate on the cover sheet of Conflict Statement of Interest-Economic Interests (Form form 700) that their statements are being filed for both their primary and their Judicial Council positions.
- b. Designated Judicial Council staff are required to file ~~disclose~~ all investments, sources of income (including gifts, loans, and travel payments), interests in real property, and positions in business entities.

#### 2. Attorneys

Attorneys are required to (1) disclose whether ~~or not~~ they were required to disqualify themselves from making, participating in making, or attempting to influence a decision of the Judicial Council during the reporting period because of a conflict of interest under Business and Professions Code section 6036; and (2) identify each decision requiring disqualification.

- a. Attorneys who are Judicial Council members ~~shall~~ are required to file ~~the~~ Statement of Economic Interests for Attorney Members of the Judicial Council ~~on~~ (form FPPC-2).
- b. Attorneys who are Judicial Council staff ~~shall~~ are required to file ~~the~~ Statement ~~Statements~~ of Economic Interests for the Attorneys in Judicial Council on-Branch Agencies (form FPPC-1).

**3. Decision-making Authority Affecting the Purchasing of Office Equipment, Materials, and Supplies**

Designated filers within this category are required to disclose investments, sources of income, and business positions in entities that are providers of office equipment, materials, and supplies, including, but not limited to, commercial and noncommercial furniture, fixtures, publication materials, printing, graphics, publishing services, audiovisual equipment, and/or any other non-IT information technology electronic devices of the type used by the Judicial Council.

**4. Decision-making Authority Affecting External Consultants and Contracts**

Designated filers within this category are required to disclose investments, sources of income, and business positions in business entities that are providers of services used by any office in the Judicial Council, for the purposes of, including but not limited to, personnel and employment services, editing, publications, data gathering, data management, researching and surveying, policy analysis, real estate management, fleet management, conference and travel services, financial services, external legal counsel, and court security.

**5. Decision-making Authority Affecting Information Technology**

Designated filers within this category are required to disclose investments, sources of income, and business positions in business entities that are providers of information technology, data management systems, computer software, computer equipment, and hardware of the type used by the Judicial Council.

**6. Decision-making Authority Affecting Judicial Education**

Designated filers within this category are required to disclose investments, sources of income, and business positions in business entities that are providers of training and educational development services of the type used by the Judicial Council.

**7. Decision-making Authority Affecting Real Property and Management**

Designated filers within this category are required to disclose investments, sources of income, interests in real property, and business positions in business entities that are providers of real estate purchasing, maintenance, construction, and development.

## Appendix D. Reporting Instructions

### 1. Time of ~~f~~Filing ~~s~~Statements and ~~r~~Reporting ~~p~~Period

- a. **Annual ~~S~~statement:** The statement ~~shall~~must disclose the information required in ~~section 3~~Appendix C in accordance with the designated filer's disclosure category for the previous 12-month period.

~~i.~~—Each Judicial Council member and each designated Judicial Council employee and contingent worker ~~shall~~is required to file a statement of economic interest in accordance with the Fair Political Practices Commission's regulations (Cal. Code Regs., tit. 2, § 18723.)

Judicial Council ~~M~~members who are not attorneys ~~shall~~are required to file an annual statement by March 1.

—All others, including but not limited to:

Judicial Council members who are ~~A~~attorneys, ~~shall~~are required to file by April 1.

- b. **Statements when assuming office:** Under Government Code sections 87200 and 87300, every Judicial Council member or designated staff incumbent ~~shall~~is required to file a statement within ~~30~~30 days after assuming office.
- c. **Statements after leaving offices:** Under Government Code sections 87200 and 87300, each former council member or designated staff incumbent ~~shall~~is required to file a statement within ~~30~~30 days after leaving office. The statement ~~shall~~must disclose the information required by ~~section 3~~Appendix- C for the period between the closing date of the last statement required to be filed and the date of leaving office.

### 2. Place of ~~f~~Filing ~~s~~Statements

~~a.~~Judicial Council members and designated staff incumbents ~~shall~~are required to file the required statements with the Secretary of the Judicial Council (Administrative Director) ~~on~~using the ~~Statement~~statement of ~~Economic Interests for Judicial Council Members Conflict of Interest-~~Formeconomic interests form 700, FPPC-1, or FPPC-2.

### 3. Assistance to ~~m~~Mmembers

~~a.~~A member may request assistance concerning duties under this code from the Fair Political Practices Commission under section 83114 of the Government Code.

**SP25-08****Judicial Council Administration: Amendment to  
Judicial Council Conflict of Interest Code**

All comments are verbatim unless indicated by an asterisk (\*)

	<b>Commentator</b>	<b>Position</b>	<b>Comment</b>	<b>Committee Response</b>
1	Stephanie Kuo	A	<p>The following comments are representative of the Superior Court of California, County of Los Angeles (Court), and do not represent or promote the viewpoint of any particular judicial officer or employee.</p> <p>In response to the Judicial Council of California's ITC SP25-03, "Judicial Council Administration: Judicial Council Conflict of Interest Code," the Court agrees with the proposal and has no other comments.</p>	None